

1 J. Colby Williams
Nevada Bar No. 5549
2 Philip R. Erwin
Nevada Bar No. 11563
3 CAMPBELL & WILLIAMS
700 South Seventh Street
4 Las Vegas, Nevada 89101
Telephone: (702) 382-5222
5 jcw@cwlawlv.com

6 Attorneys for Defendant
7 ZUFFA, LLC

8
9
10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

11 HASAN DAAS, BRAD GRIER, WESLEY
INMAN, MATT LEOEUF, DAMIAN LUNA,
12 LLOYD TRUSHEL, MARK WHITE, and
DONGSHENG LIU, on behalf of themselves
and all others similarly situated,

13 Plaintiffs,

14 v.

15 NEULION, INC., and ZUFFA, LLC,

16 Defendants.
17

Case No. 2:17-cv-02767-RFB-VCF

**JOINT MOTION FOR STAY,
EXTENDING TIME FOR ZUFFA, LLC
TO RESPOND TO THE COMPLAINT
(First Request Since Transfer)**

18
19 WHEREAS, this stipulation is entered into by and between Plaintiffs Hasan Daas, Brad
20 Grier, Wesley Inman, Matt Leboeuf, Damian Luna, Lloyd Trushel, Mark White, and Dongsheng
21 Liu (together “Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”);

22 WHEREAS, this action was assigned to this Court on November 1, 2017, as a result of the
23 action having been transferred from the Southern District of New York (ECF No. 22);

24 WHEREAS, there are seven other actions related to this case pending in multiple United
25 States District Courts across the country (the “Actions”), including two in this District, *Riley v.*
26 *Zuffa, LLC*, No. 2:17-cv-02308-APG-GWF (the “*Riley Action*”) and *Park v. Zuffa, LLC*, No. 2:17-
27 cv-2282-APG-VCF (the “*Park Action*”);

28 WHEREAS, in light of the substantial similarities in the allegations and claims in the

1 Actions, on October 3, 2017, a motion was filed with the Judicial Panel on Multidistrict Litigation
2 (“JPML”) to centralize the Actions before a single judge for coordinated pretrial proceedings under
3 28 U.S.C. § 1407 (the “MDL Motion”);

4 WHEREAS, the JPML will be holding a hearing on the MDL Motion on November 30,
5 2017;

6 WHEREAS, on October 6, 2017, United States Magistrate Judge George Foley, Jr. granted
7 Zuffa’s request to stay the *Riley* Action pending a decision by the JPML on the MDL Motion;

8 WHEREAS, on October 13, 2017, United States Magistrate Judge Cam Ferenbach granted
9 Zuffa’s, along with its parent company, UFC Holdings, LLC’s, request to stay the *Park* Action on
10 the same terms;

11 WHEREAS, in the four other Actions in which Zuffa is a defendant, which includes the
12 *Riley* and *Park* Actions and two Ninth Circuit-based actions, *Garcia v. Showtime Networks, Inc.*,
13 No. 3:17-cv-01803-JM-AGS (S.D. Cal.), and *Ferrandini v. Zuffa, LLC*, No. 2:17-cv-06781-R-KS
14 (C.D. Cal.), stays or extensions of time have been provided pending a decision by the JPML;

15 WHEREAS, since the action was transferred and assigned to this Court, this is the first
16 request for an extension of time to respond to Plaintiffs’ Complaint sought by Zuffa;

17 WHEREAS, based on the above, there is good cause to stay this action along with the four
18 other Actions in which Zuffa is a defendant pending a decision by the JPML, as such will not
19 prejudice any party, will protect all parties from duplicative and burdensome efforts and potentially
20 inconsistent rulings, and will promote judicial economy and efficiency;

21 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
22 Plaintiffs and Zuffa, subject to approval of the Court, as follows:

- 23 1. Zuffa’s time to answer, move, or otherwise respond to Plaintiffs’ Complaint is hereby
24 extended pending a decision by the JPML. If the JPML coordinates or consolidates
25 the Actions in this Court, or if it denies centralization, the parties shall contact the
26 Court promptly after receipt of that Order to discuss an appropriate schedule for
27 filing a consolidated or amended complaint, if applicable, and a response date to the
28 operative complaint.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2. By submission of this motion for a stay to extend Zuffa's time to respond to Plaintiffs' Complaint, Zuffa is not waiving and expressly reserves any defense, including for failure to state claim.

IT IS SO STIPULATED.

DATED: November 3, 2017

FARUQI & FARUQI, LLP

/s/ Innessa M. Huot

Innessa Melamed Huot

Attorneys for Plaintiffs

DATED: November 3, 2017

CAMPBELL & WILLIAMS

/s/ Philip R. Erwin

J. Colby Williams

Philip R. Erwin

IT IS HEREBY ORDERED that a status hearing is scheduled for 10:00 AM, January 22, 2018, in Courtroom 3D.

Attorneys for Defendant ZUFFA, LLC

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 11-15-2017